

EXHIBIT F

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

C.A. NO: 02-12216 PBS

H. CHARLES TAPALIAN

vs.

LAWRENCE HAVRYLIK, ET AL

DEPOSITION OF CYNTHIA J. DACANAY,

taken pursuant to Rule 30 of the
Massachusetts Rules of Civil Procedure on
behalf of the Plaintiff, before Dawn M.
Cunningham, CSR, RPR, and Notary Public in
and for the Commonwealth of Massachusetts, at
the offices of Goudreau & Grossi Court
Reporting, 63 Winthrop Street, Taunton,
Massachusetts, on **Friday, May 27, 2005**,
commencing at 1:00 p.m., pursuant to Notice
and agreement of parties as to the date and
time of taking said deposition.

* * * * *

Goudreau & Grossi
Court Reporting Service, Inc.
63 Winthrop Street
Taunton, Massachusetts 02780

1 A I don't recall.

2 Q Okay. Have any selectmen ever complained
3 about the length of time it took to get the
4 executive session minutes back before them?

5 A No.

6 Q Have any selectmen requested that you
7 rephrase anything that's been included in the
8 executive session minutes that you've
9 furnished them?

10 A I don't recall.

11 Q Have any of the selectmen asked to have the
12 tapes from a previous session replayed or
13 played for them?

14 A No.

15 Q Have any town administrators or selectmen
16 during your time asked to listen to any of
17 the tapes?

18 A I don't recall.

19 Q Have you given any of the town administrators
20 or selectmen or anyone else the tapes from
21 these executive sessions?

22 A Yes.

23 Q Okay. And who have you given tapes to?

24 A Mr. McInerney.

1 Q All right. How many tapes has Mr. McInerney
2 received?

3 A I don't -- I don't recall the exact number.

4 Q It was more than one?

5 A Yes.

6 Q Okay. And was it your understanding that Mr.
7 McInerney -- what was your understanding of
8 what the purpose of requesting those tapes
9 was, if any?

10 A I didn't ask.

11 Q Okay. He was your boss so you just complied
12 with his request?

13 A That's correct.

14 Q Do you know what he did with the tapes?

15 A Returned them to me.

16 Q Okay. Do you know whether he made copies of
17 the tapes while he had them in his
18 possession?

19 A I wouldn't know.

20 Q Did the tapes that he requested have any
21 relationship to Mr. Tapalian in any way?

22 A I don't -- I don't recall.

23 Q Okay. Did Mr. McInerney request these tapes
24 throughout the time that he was town

1 adminsitrator?

2 A In his capacity as town adminsitrator.

3 Q Yes. I guess I'm asking throughout the term
4 that he was administrator. In other words,
5 from the beginning right through the end he
6 was asking at times for tapes?

7 A Yes.

8 Q Okay. Mr. Keegan had never done that?

9 A No.

10 Q And none of the department heads came up and
11 asked you for tapes?

12 A No.

13 Q All right. None of the selectmen requested
14 tapes?

15 A No.

16 Q Mr. Beal, when he was acting town
17 adminsitrator, didn't ask you for tapes?

18 A I don't know.

19 Q You don't recall?

20 A I don't recall.

21 Q Okay. That wasn't a long time anyway as I
22 recall.

23 But in any event, did Mr. McInerney
24 have to sign any documentation related to

1 these tapes?

2 A No.

3 Q No receipts?

4 Okay. Did you give Mr. McInerney the
5 tapes before or after you had transcribed the
6 minutes using the tapes?

7 A I don't recall.

8 Q Could it have been both ways, sometimes
9 before, sometimes after?

10 A Yes.

11 Q Okay. Did you -- have you talked with Mr.
12 McInerney about this litigation that involves
13 Mr. Havrylik and the others, Mr. Keegan and
14 so forth?

15 A No.

16 Q Did you talk with Mr. McInerney about the
17 case that involves him, Mr. McInerney?

18 A I don't recall.

19 Q Are you aware of any information that Mr.
20 Tapalian has done anything improper in the
21 Town of Seekonk?

22 A I wouldn't know that.

23 Q I'm just asking your own understanding.

24 No?